

November 20, 2012

Chairman Julius Genachowski
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20054

Re: MB Docket No. 09-182, 2010 Quadrennial Review

Dear Chairman Genachowski:

The united Free Community Paper Industry urges the Federal Communications Commission to reconsider an end-of-year rush, as reported in the press, to permit new cross-media consolidation without a robust analysis of the just-released the court-ordered data on Female and Minority Broadcast Ownership. As matters of substance and process, finally counting who owns what, while completely failing to address the impact of proposed rule changes, does not meet the court's demands.

As stakeholders, commenters and participants in the current and prior Quadrennial Reviews, as well as in the proceedings of the Future of Media Report, we have consistently pleaded for the Commission to conduct a comprehensive evaluation of the impact on smaller media enterprises, as well as on disadvantaged, female and minority ownership. We have stressed over and over again our anticompetitive concerns as local media enterprises competing against rivals already outsized via intra-industry consolidation, and called for a granular examination of the local media ecosystem. If reports on the Rule and the rush to proceed are accurate, our role in serving the information needs of our communities would appear to be a "you don't know what you've got till it's gone" proposition before the Commission.

Having previously detailed the anticompetitive hazards of local, cross-media consolidation which are clearly forecast by the fallout from prior waves of intra-industry mergers, we also draw attention to additional factors that could bring about a perfect storm for hometown media: The looming Spectrum Auctions combined with the real prospect of the elimination of Open Internet Safeguards. We believe the Commission should also offer at the least, a preliminary analysis of combined impacts of potential scenarios arising from multiple, interrelated media policies directed by its authority. An outcome such as fewer firms, with artificially skewed valuations, competing at severe disadvantages with local cross-media juggernauts across traditional and digital channels, under pay-to-play bandwidth prioritization regimes, would not likely enhance the objectives of diversity, localism and competition.

We respectfully request that the Commission abandon any plans to issue Final Rules in the absence of aforementioned analysis, and the rightful opportunity for public comment on same.

Sincerely,

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On Behalf of the united Free Community Paper Industry Associations:

AFCP - Association of Free Community Papers
MACPA - Mid-Atlantic Community Papers Association
IFPA - Independent Free Papers of America
CPNE - Free Community Papers of New England
MFCP - Midwest Free Community Papers
PNAWAN - Pacific Northwest Association of Want Ad Newspapers
SAPA - Southeastern Advertising Publishers' Association
SACP - Southwestern Association of Community Publications
CPI&I - Community Papers of Indiana and Illinois
CPF - Community Papers of Florida
CPM - Community Papers of Michigan
WCP - Wisconsin Community Papers
TCNA - Texas Community Newspaper Association
MFPA - The Minnesota Free Paper Association
CPOWV - Community Papers of Ohio and West Virginia
FCPNY - Free Community Papers of New York

CC: Commissioner Robert M. McDowell
Commissioner Mignon L. Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit V. Pai